

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

GENOVA BURNS LLC

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Local Counsel for the Plan Administrator

In re:

BLOCKFI INC., *et al.*,

Wind-Down Debtors.¹

Adv No.: 23-01175

Case No.: 22-19361

Judge: Hon. Michael B. Kaplan

Chapter: 11

Hearing Date: November 6, 2023

ADJOURNMENT REQUEST

1. I, Donald W. Clarke, Esq.

☒ am the attorney for: the Wind-Down Debtors and Plaintiff,

☐ am self-represented,

and request an adjournment of the hearings on the following matters for the reason set forth below.

- i. *BlockFi International Ltd.'s Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Holding Vrai Nom in Contempt and Imposing Sanctions for Willful Violations of the Automatic Stay and (III) Granting Related Relief* [Docket No. 1330].
- ii. *Letter Brief in Opposition to BlockFi International Ltd.'s Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Holding Vrai Nom in Contempt and Imposing Sanctions for Willful Violations of the Automatic Stay and (III) Granting Related Relief* [Docket No. 1495]
- iii. Pre-Trial Hearing in Adversary Proceeding No. 23-01175 (MBK).

¹ The Wind-Down Debtors in these Chapter 11 cases, along with the last four digits of each Wind-Down Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is 100 Horizon Center Blvd., 1st and 2nd Floors, Hamilton, NJ 08691

Current hearing date and time: November 6, 2023, at 10:00 a.m.

New date requested: November 28, 2023, at 10:00 a.m.

Reason for adjournment request: BlockFi International and Vrai Nom request an adjournment to continue exploring a potential resolution of the BlockFi International's claims. In accordance with D.N.J. LBR 9013-2(a)(3), Vrai Nom has also agreed to allow BlockFi International until November 24, 2023, to file a reply. All other rights of the parties are reserved.

2. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below):

I certify under penalty of perjury that the foregoing is true.

Date: November 1, 2023

/s/ Donald W. Clarke

Signature

COURT USE ONLY:

The request for adjournment is:

- | | | |
|--|--|-------------------------------------|
| <input checked="" type="checkbox"/> Granted | New hearing date: <u>November 28, 2023 at 10:00 am</u> | <input type="checkbox"/> Peremptory |
| <input type="checkbox"/> Granted over objection(s) | New hearing date: _____ | <input type="checkbox"/> Peremptory |
| <input type="checkbox"/> Denied | | |

IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.